

November 9, 2010

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My name is Alison Teetor, I live at 107 Taylor St., Berryville, Virginia 22611. My phone number at home is 540-955-3238. I am representing myself as a citizen of the northern Shenandoah Valley.

Thank you for the opportunity to comment on the draft Prevention of Significant Deterioration permit from the Department of Environmental Quality to limit air pollution from the proposed Dominion Power Warren County Power Station, a natural gas-fired electric power generating facility.

I am formally requesting that this permit application be reviewed and have an additional Public Hearing by the State Air Pollution Control Board for the following reasons.

I am concerned about the addition of a major air polluter in our region that will reduce our visibility and increase acidity in our waterways. Of bigger concern however, is the potential impact of the plant emissions on Shenandoah National Park. As you know, the Clean Air Act administered by the Environmental Protection Agency sets the air quality standards for the nation. Restrictions on

emissions are strictest in Class I areas. Shenandoah National Park is a designated Class I area.

The purpose of the Clean Air Act and the Class I designation in part is to “preserve, protect, and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreational, scenic, or historic value”

The Clean Air Act amendments of 1977 required “the Administrator, after consultation with the Secretary of the Interior, to promulgate a list of mandatory class I Federal areas in which he determines visibility is an important value.” Class I designations are given only for pristine natural areas, the purpose of which is to give additional protection to areas that are important nationally to the citizens of the United States. Shenandoah National Park is one of only 58 National Parks in the Country. It is the only National Park in Virginia. As a citizen of Virginia I feel obligated to speak in support of protecting OUR National Park.

Due in part to its proximity to major metropolitan areas this Park is constantly under siege. In 2000 the National Parks Conservation Association established the Center for State of the Parks in order to assess the health of our national parks by objectively examining the resource conditions and threats in selected park units.

The June 2003 State of the Parks Issue was devoted to Shenandoah. In part the publications states:

“Shenandoah faces increasingly serious effects from poor air quality. Acid rain has significantly affected soils and aquatic resources in the Park and remains the

number one known threat to overall water quality, and haze caused by air pollution has reduced average annual visibility at scenic overlooks from about 115 miles to less than 25.”

This study was completed in 2003 and showed then problems and continued degradation of air quality in the Park without the addition of a “major” pollution source less than 5 miles from the Park Boundary.

It is my understanding in talking with DEQ personnel that the proposed plant will be generating 1,421 tons of emissions each year. According to EPA "Acid rain" results from primarily emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). The proposed plant will emit 330 tons of nitrogen oxides and 12 tons of sulfur dioxide every year. Particulate Matter (PM) is the major cause of reduced visibility or haze. The proposed plant will emit 430 tons of PM each year.

If approved this will be one of the largest electric power production plant permitted in Virginia. I for one do not think it should be located less than 5 miles from the National Park. I am not an air quality modeler but it seems to me that the emissions are substantial and there will be a negative impact to the air quality in the Park and the surrounding area if this facility is built.

So all that said, I would respectfully request 1) that DEQ staff request a public hearing and review by the State Air Pollution Control Board due to the potential significant negative impact to air quality in the northern Shenandoah Valley and the National Park and 2) if this is truly the only location this plant can be sited, that the standards regarding emissions and emission controls be changed from Best Available Control Technology (BACT) to Lowest Achievable Emissions

Rate (LAER); I understand that LAER is normally used for facilities located in nonattainment areas, but given the plant's proximity to the Park the DEQ and the Air Board should require a LAER-type analysis for all pollutants; 3) I am confused about how particulate matter is addressed in the draft permit. It appears as though PM-2.5 is being included in the emissions for PM-10 (211.5 tons per year) however in information I got directly from DEQ the PM levels were split out (PM-10 – 216.1 tpy, PM-2.5 – 215.6 tpy). Since the Clean Air Act requires that each be treated independently in the permit it appears as though the draft permit should be amended to show the accurate numbers and 4) with regards to the offsets for emissions of nitrogen oxides. As I understand it, the draft permit requires NOx offsets, at a ratio of 1.15 to 1, for sources close to the Park. (i.e., for each 1 ton of NOx emitted, Dominion has to find 1.15 tons of reductions nearby from other facilities.) This should be strengthened to 2 to 1 for sources close to the Park and if Dominion is not able to get sufficient offsets close to the park, they should be required to find offsets at a 3 to 1 ratio if the facilities are farther away. This should not be considered unreasonable given the significant risk the Plant poses to the National Park.

Thank you for your consideration.